



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

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MCAS EL TORO  
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July 10, 1998

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

**SUBJECT: Proposed Plan for Closure of Inactive Landfills at  
Marine Corps Air Station El Toro, Dated May 1998**

Dear Mr. Joyce:

The purpose of this letter is to formally submit comments from the Orange County Solid Waste Local Enforcement Agency regarding the proposed plan for the closure of inactive landfill sites 3 and 5 at Marine Corps Air Station (MCAS) El Toro.

The Orange County Health Care Agency, Environmental Health Division, is certified by the California Integrated Waste Management Board (CIWMB) to be the Solid Waste Local Enforcement Agency (LEA) for all cities and unincorporated areas of Orange County. The LEA permits and inspects solid waste facilities (active landfills, transfer stations and composting facilities), and oversees the assessment, remediation, closure and development of inactive and closed landfills within Orange County. This authority will extend to the closed landfill sites at MCAS El Toro following the de-listing of the inactive landfills as "Superfund" sites. The LEA's regulatory oversight will most likely begin before the redevelopment of the areas encompassing and surrounding landfill site 3 and may also occur prior to the construction of an irrigated golf course at site 5. Therefore, we have a direct interest in the Proposed Plan for the closure of the landfills at MCAS El Toro since the remedy selected for the landfills will have a direct effect on public health and safety issues associated with the reuse of these areas.

The assumptions made in the proposed plan appear to be a "best case" scenario based on a limited characterization of the waste material contained in each landfill. Although the landfill gas data collected during the 1991 SWAT test and the remedial investigation suggest that landfill gas generation may be limited, we believe the studies are not adequate to assure migration of landfill gas will not impact the future reuse of the areas adjacent to the landfills. The assumptions made regarding the limited potential for landfill gas generation cannot be validated

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without a more comprehensive waste characterization which has not been performed at either site 3 or 5. In addition, an ongoing monitoring program, including Title 27 permanent gas monitoring probes, should be installed prior to the final selection of the proposed remedy for sites 3 and 5. Such an installation would provide the gas monitoring data necessary to evaluate the proposed remedy for these sites.

In summary, the LEA is concerned that the proposed remedies for landfill sites 3 and 5 (native soil caps) are in conflict with the proposed irrigated land reuse at site 5 and may be in conflict with the proposed reuse of site 3. Further, the proposed remedies may restrict future land use of the site. The LEA supports the CIWMB, DTSC and Orange County's MCAS El Toro Local Redevelopment Authority's position that other more conservative remedies may be more compatible with future land uses.

Thank you for the opportunity to provide comments on the proposed plan. If you have any questions regarding the comments in this letter, please contact Patricia Henshaw, Supervising Hazardous Waste Specialist, at (714) 667-2014.

Sincerely,



Jack Miller, REHS, Director  
Solid Waste Local Enforcement Agency  
Environmental Health Division

JM:ss

cc: Candace Haggard, MCAS El Toro Master Development Program  
Scott Walker, California Integrated Waste Management Board  
Tayseer Mahmoud, Department of Toxic Substances Control  
Patricia Hannon, Santa Ana Regional Water Quality Control Board  
David Jones, South Coast Air Quality Management District